

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROTHSCHILD CONNECTED DEVICES §
INNOVATIONS, LLC §

Plaintiff, §

vs. §

GUARDIAN PROTECTIONS SERVICES, §
INC., §

Defendant. §

Case No: 2:15-cv-1431-JRG-RSP

LEAD CASE

ROTHSCHILD CONNECTED DEVICES §
INNOVATIONS, LLC §

Plaintiff, §

vs. §

ADS SECURITY, LP §

Defendant. §

Case No: 2:15-cv-1463-JRG-RSP

LEAD CASE

**PLAINTIFF’S OPPOSED MOTION TO DISMISS DEFENDANT
ADS SECURITY, LP WITH PREJUDICE**

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff Rothschild Connected Devices Innovations, LLC (“Rothschild”) moves to dismiss its claims against ADS Security, LP. with prejudice.

Wherefore, Rothschild moves this Court to dismiss this action and all claims by Rothschild against ADS Security, LP and any counterclaims or other claims that ADS Security, LP has, with prejudice, with each party to bear its own costs, attorney’s fees and expenses and request that the Court enter the proposed order of dismissal submitted herewith.

Dated: January 21, 2016

Respectfully submitted,

/s/Jay Johnson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

The undersigned certifies that, on January 20, 2016, he met and conferred with Defendant's counsel concerning this motion and that Defendant's counsel does not agree to this motion.

/s/ Jay Johnson

Jay Johnson

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 21, 2016.

/s/Jay Johnson

Jay Johnson